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AT&T

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May 1, 1998

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street, NW, Room 222
Washington, D.C. 20554

> Re: *Ex parte*, CC Docket No. 97-208 Applications by BellSouth
> Telecommunications, Inc. and BellSouth Long Distance, Inc. for
> Provisioning of In-Region, interLATA Service in South Carolina; Public
> Notice, DA 98-139 (rel. Jan. 17, 1998)

Dear Ms. Roman Salas:

On Thursday April 30, 1998, David Eppsteiner, John Hamman, Steve Garavito, Jay Bradbury and I of AT&T met with Carol Mattey, Jake Jennings, Jordan Goldstein, Joe Welch, David Kirschner, and Brent Olsen of the Common Carrier Bureau's Policy and Planning Division and Patrick DeGraba of the Office of Plans and Policy. The purpose of this meeting was to update the Staff on AT&T's experiences in the BellSouth region with operational support systems and other checklist items. Attached is a summary that AT&T provided and used during its presentation.

Two copies of this Notice are being submitted on the next business day to the Secretary of the FCC in accordance with Section 1.1206(a)(1) of the Commission's rules.

Sincerely,

Robert W. Quinn.

cc: J. Jennings   J. Goldstein
     C. Mattey   J. Welch
     B. Olsen   P. DeGraba
     D. Kirschner

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BellSouth OSS Deficiencies

Presentation to the

Federal Communications Commission

by AT&T Corp.

April 30, 1998

BellSouth Is Not Providing Access to OSS in Compliance with the Act

- **The FCC identified several deficiencies in BellSouth's OSS in its SC & LA orders.**

    – BellSouth has introduced new interfaces and resolved some issues, but significant problems still remain.

- **BellSouth refuses as a matter of policy to develop electronic interfaces for ordering UNE combinations.**

Deficiencies Identified in the
FCC's SC & LA Orders

- Lack of flow through

- Failure to provide necessary information and support

- Lack of timely error and rejection notices

- Lack of timely FOCs

- Lack of jeopardy notices

- Failure to show nondiscriminatory provisioning intervals

- Failure to show timely completion notices

- Lack of integratable interfaces

- Lack of nondiscriminatory access to due dates

- Practical access to product and service and IXC information

- Restrictions on access to phone numbers

- OSS capacity

Electronic Flow-Through

- BellSouth data submitted in Alabama shows that only 9.3% of all CLEC orders in January '98 electronically flowed through its system.

- Less than 60% of EDI orders flowed through without human intervention.

- AT&T UNE combination orders are being processed manually by <u>one</u> BellSouth person.

- BellSouth will not offer end-to-end electronic ordering of UNE combinations.

Lack of Specifications, Business Rules and Other Necessary Information

- After a year of requests, BellSouth provided SOER edits in January '98 as part of the Georgia OSS proceeding. It has not provided updates, which are required monthly.

- BellSouth has not provided its non-SOER internal directory listing nor BAPCO's directory listing edits. Directory listing orders still fall out on both the BellSouth and BAPCO side.

- BellSouth still provides delayed updates to its various user guides.

Change Management Process

- **At CLEC insistence, BellSouth and CLECs are developing a change management process.**

    - Process is limited to <u>electronic</u> interfaces.

    - Process appears focused on getting industry input on CLEC-initiated changes.

    - BellSouth will provide advance notice of -- but will not accept input on -- changes it initiates.

- **Prior CLEC involvement in BellSouth-initiated changes is vital.**

    - BellSouth insisted that AT&T had to include USOCs on directory listing orders using EDI-7.0. In April '98 -- after AT&T had coded its side of the interface -- BellSouth said that USOCs must not be included, otherwise orders will be rejected. As a result, the AT&T Digital Link SRT was delayed.

Lack of Specifications, Business Rules and Other Necessary Information (cont.)

- **BellCore evaluated BellSouth's software process maturity.**

  - Per BellCore, BellSouth's software development environment is "undefined (ad hoc) and unstable." Software processes "are constantly being changed or modified."

Lack of Timely Error and Rejection Notices

- For February '98, BellSouth reports that more than 57% of rejection notices to AT&T took more than one hour.

- AT&T data shows that in February the average time to receive rejection notices ranged from 59.22 hours (Week 1) to 143.25 hours (Week 3).

- ITC^DeltaCom stated in Alabama that it receives rejection notices 2-3 days after submitting orders.

- In March '98, BellSouth implemented electronic rejection notices, but only for about 180 of the roughly 2,000 possible order errors.

Lack of Timely FOCs

- AT&T data shows the following FOC receipt information for consumer migration orders:

    - Week of 2/9/98

        - 50% within 4 hours
        - 13% more than 24 hours

    - Week of 2/23/98

        - 10% more than 96 hours

- ITC^DeltaCom stated in Alabama that only 44% of its FOCs were returned within <u>48 hours</u>, and 20% were never returned.

- BellSouth inappropriately reports orders in "clarification" as having received a FOC within 24 hours.

Lack of Jeopardy Notices

- **BellSouth has not changed its processes for providing CLECs with jeopardy notices for BellSouth-caused delays.**

    – Notices are not timely.

    – Notices are manual.

Discriminatory Provisioning Intervals

- **BellSouth data submitted for Alabama shows discriminatory provisioning intervals. E.g.,**

  - New Residential Non-Dispatched

    - BellSouth   86.33% within 2 days
    - CLECs   55.43% within 2 days

  - New Business Non-Dispatched

    - BellSouth   84.21% within 1 day
    - CLECs   67.86% within 1 day

Discriminatory Provisioning Intervals (cont.)

- BellSouth's target interval for a new install for resale (with dispatch) is one day.

- For the analogous provision of an unbundled loop, BellSouth's target interval is seven days.

- For provision of a loop/port combination -- which BellSouth treats as resale -- the target interval is three days.

Discriminatory Provisioning Intervals (cont.)

- AT&T data shows that AT&T provided BellSouth an average of 8.72 days to provision consumer migration orders in February '98, but BellSouth required 9.24 days on average to provision these orders.

- ITC^DeltaCom testified in Alabama that it took BellSouth 6.4 days to fill DeltaCom's resale orders.

Lack of Timely Completion Notices

- BellSouth's performance is erratic. For example, for two weeks in February '98, 15% and 10% of completion notices, respectively, were received 48 hours or more after the service was completed.

Discriminatory Access to Due Dates

- **BellSouth cannot provide a due date calculation functionality (for the LENS Inquiry mode) until 12/31/98.**

  - ECLite does <u>not</u> have this functionality despite AT&T's repeated requests that it be included.

- **For a year, BellSouth testified that DSAP performed this calculation.**

- **BellSouth now states that it is up to the CLEC to develop software to calculate due dates based on information provided by DSAP.**

Discriminatory Access to Product and Service and IXC Information

- **BellSouth's pre-ordering interfaces lack the following functionality available to a BellSouth marketing representative:**

  - Search capability for products and services

  - Listing of all available NXXs

  - Search capability for finding IXC PIC codes

  - Implementation dates for new services by central office

  - Ringing patterns for lines with RingMaster service

Restrictions on Access
to Telephone Numbers

- **The central office restrictions (100 numbers or 5%) have been removed.**

  - No M&Ps have been developed to allocate numbers (including those requested by BellSouth) in central offices where they are in short supply.

- **Number reservation**

  - In LENS, CLECs may reserve only six numbers per request and no more than 12 per session.

  - With ECLite, AT&T may reserve up to 25 numbers per request.

OSS Capacity

- **BellSouth has not demonstrated that its projected volume requirement is reasonable.**

  - Ernst & Young was not asked to analyze the volume requirement.

  - Capacity should be measured on a busy hour basis, not a daily basis.

- **BellSouth's capacity testing methodology has not been shown to be reasonable.**

  - BellSouth did not implement many of the May '97 IBM recommendations.

    - Peak loads (capacity for peak busy hour)
    - Transaction type (split between LENS and EDI orders)
    - Access method (LAN-to-LAN vs. dial-up or internet)

Maintenance and Repair

- **BellSouth has two options for maintenance and repair -- TAFI and EBI (ECTA).**

- **TAFI has more extensive functionality than EBI, but is a human-to-machine interface.**

  - The CLEC representative must manually enter information into the CLEC's internal OSS.

- **EBI is a machine-to-machine interface, but lacks TAFI's functionality.**

- **ITC^DeltaCom stated in Alabama that in only 13% of troubles did BellSouth notify it that the trouble was corrected.**

Billing

- CABS-formatted bills have not balanced internally (i.e., the sum of the individual charges does not match the total).

- AT&T seeking a refund of $320,000 for overbillings (using CRIS billing) for resale customers in Georgia.

- KMC stated in Alabama that resale discounts are still being applied incorrectly.

- BellSouth has not provided accurate and verifiable charges to AT&T for individual UNEs.

- In late March, AT&T received a readable Access Daily Usage File from BellSouth. AT&T is implementing testing to verify the ADUF's accuracy.

UNE Combinations

- **"BellSouth, at this time, has no plans to make available an electronic end to end process to order combined UNEs (or UNE-P)."**

  - Orders may be submitted via EDI-7.0 with an "M" indicator, but "the actual ordering process in the LCSC will be manual."

  - "Neither the EDI PC . . . nor the LENS ordering vehicle are currently equipped to process loop/port UNE combination orders. There is no plan at this time to enhance these systems to make this electronic ordering ability available." 2/23/98 letter from BellSouth

AT&T Utilization of BellSouth's Electronic Interfaces for Local Service

Interface	Purpose	Period of Use
Local Exchange Navigation System (LENS) – Pre-Ordering	Telephone Number Reservation Customer Service Records Address Validation Service and Feature Availability Due Date Calendar/Calculation	September 97 – on-going Supports embedded TSR base Supports ADL Supports UNE-P trial
EC-Lite – Pre-Ordering	Same as LENS	Service Readiness Testing Began Jan 98
Electronic Data Interchange (EDI) – Mainframe	Ordering/Provisioning – Resale and Customer Specific Network Elements	Version 6 – February 97 – April 98 Version 7 – April 98
Electronic Data Interchange – Personal Computer (EDI-PC)	Same as EDI Mainframe	Certified for Version 7 release on 4/17 Supports UNE-P trial and ADL
Application Programming Interface (API)	Pre-Ordering, Ordering and Provisioning	Under development by BellSouth, pre-ordering implementation targeted for 8/98, ordering for 11/98. AT&T is monitoring this effort
Trouble Analysis Facilitation Interface (TAFI)	Maintenance and Repair	Evaluated July 97 – not implemented
Electronic Bonding Interface (EBI)	Maintenance and Repair	Tested late March 98 – turned down April 9, test results being analyzed
Regional Street Address Guide/Inter-exchange Carrier Reference (RSAG/IC-REF)	Address Validation	February-September 97, replaced by LENS
Products and Services Inventory Management System – Central Office Features and Functions Inventory (P/SIMS-COFFI)	Service and Feature Availability	February 97 – on-going
Automated Telephone/Line Administration System (ATLAS)	Telephone Number Reservation	February-September 97, replaced by LENS
Exchange Access Control and Tracking System (EXACT)	Ordering/Provisioning – Infrastructure Network Elements	December 97 – on-going
Exchange Message Record (EMR)	Customer and Carrier Usage Data	February 97 – on-going, policy and technical issues in systems behind the interface exist
Carrier Access Billing System (CABS)	Bill from BellSouth to AT&T	Not yet accurate, in testing for TSR since August 97, UNE test pending
Local Account Management/Customer Account Record Exchange (CARE)	Management of Customer LD PIC Information and Out PLOC Notices	February 97 – on-going

UNE Combinations

- "In all states except Kentucky, when AT&T orders a combination of network elements or orders individual network elements that, when combined, duplicate a retail service provided by BellSouth, BellSouth will treat, for purposes of billing and provisioning, that order as one for resale." 4/17/98 letter from BellSouth

UNE Combinations - Collocation

- BellSouth currently offers only collocation (physical and virtual) as the method it will permit for combining UNEs.

- AT&T suggested alternatives, primarily the recent change process, but BellSouth has stated it has "no interest" in pursuing them.

- BellSouth appears to be insisting on collocation for AT&T to receive existing combinations per its interconnection agreements, even in Kentucky where AT&T is entitled to receive existing combinations at UNE rates.